

JS 44 (Rev. 10/20)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Marquet Parsons, 7907 Lindburgh Boulevard, Phila., PA 19153

(b) County of Residence of First Listed Plaintiff Bucks
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Law Offices of Willam J. Fox, P.C. (215) 546-2477
100 N. 20th Street, Ste. 303, Phila., PA 19103

DEFENDANTS

City of Philadelphia, Sheriff's Office, C/O Law Dept.
1515 Arch Street, Philadelphia, PA 19102

County of Residence of First Listed Defendant Philadelphia
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability LABOR <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RS1 (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Title VII of 1964 Civil Rights Act; ADEA

Brief description of cause:

Discrimination/Retaliation in workplace

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

6-10-25

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

10/2024

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DESIGNATION FORM

Place of Accident, Incident, or Transaction: Philadelphia, PA

RELATED CASE IF ANY: Case Number: 20-CV-5575 Judge: Gene E. K. Pratter

- | | |
|---|---|
| 1. Does this case involve property included in an earlier numbered suit? | Yes <input type="checkbox"/> |
| 2. Does this case involve a transaction or occurrence which was the subject of an earlier numbered suit? | Yes <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent which was the subject of an earlier numbered suit? | Yes <input type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus petition, social security appeal, or pro se case filed by the same individual? | Yes <input type="checkbox"/> |
| 5. Is this case related to an earlier numbered suit even though none of the above categories apply?
If yes, attach an explanation. | Yes <input type="checkbox"/> |

I certify that, to the best of my knowledge and belief, the within case ☒ is / ☐ is not related to any pending or previously terminated action in this court.

Civil Litigation Categories

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts)
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Wage and Hour Class Action/Collective Action
- ☐ 6. Patent
- ☐ 7. Copyright/Trademark
- ☒ 8. Employment
- ☐ 9. Labor-Management Relations
- ☐ 10. Civil Rights
- ☐ 11. Habeas Corpus
- ☐ 12. Securities Cases
- ☐ 13. Social Security Review Cases
- ☐ 14. Qui Tam Cases
- ☐ 15. Cases Seeking Systemic Relief *see certification below*
- ☐ 16. All Other Federal Question Cases. (Please specify): _____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): _____
- ☐ 7. Products Liability
- ☐ 8. All Other Diversity Cases: (Please specify) _____

I certify that, to the best of my knowledge and belief, that the remedy sought in this case ☐ does / ☐ does not have implications beyond the parties before the court and ☐ does / ☐ does not seek to bar or mandate statewide or nationwide enforcement of a state or federal law including a rule, regulation, policy, or order of the executive branch or a state or federal agency, whether by declaratory judgment and/or any form of injunctive relief.

ARBITRATION CERTIFICATION (CHECK ONLY ONE BOX BELOW)

I certify that, to the best of my knowledge and belief:

☒ Pursuant to Local Civil Rule 53.2(3), this case is not eligible for arbitration either because (1) it seeks relief other than money damages; (2) the money damages sought are in excess of \$150,000 exclusive of interest and costs; (3) it is a social security case, includes a prisoner as a party, or alleges a violation of a right secured by the U.S. Constitution, or (4) jurisdiction is based in whole or in part on 28 U.S.C. § 1343.

☐ None of the restrictions in Local Civil Rule 53.2 apply and this case is eligible for arbitration.

NOTE: A trial de novo will be by jury only if there has been compliance with F.R.C.P. 38.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

Marquet Parsons	:	CIVIL ACTION
	:	
v.	:	
	:	
City of Philadelphia Sheriff's Office C/O City Law Department	:	NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (☒)

6-10-2025	William J. Fox, Esq.	Plaintiff
Date	Attorney-at-law	Attorney for
(215) 546-2477		wjf@billfoxlaw.com
Telephone	FAX Number	E-Mail Address

(Civ. 660) 10/02

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARQUET PARSONS :
7907 Lindbergh Boulevard :
Philadelphia, PA 19153 :

Plaintiff :

v. :

CITY OF PHILADELPHIA :
SHERIFF'S OFFICE :
C/O CITY LAW DEPARTMENT :
1515 Arch Street :
Philadelphia, PA 19102 :

Defendant :

COMPLAINT

1. This Court has jurisdiction over this matter under Title VII of the 1964 Civil Rights Act, et seq.; and, the Age Discrimination in Employment Act giving rise to Federal Question Jurisdiction pursuant to 28 U.S.C. § 1331 and Civil Rights Jurisdiction pursuant to 28 U.S.C. § 1347.

2. This Court has supplemental jurisdiction over Plaintiff's state law claims made herein pursuant to 28 U.S.C. § 1367, as the claim is so related to claims in the action within such original jurisdiction of this Court that they form part of the same case or controversy.

3. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) because the parties reside in this district, regularly conduct business in this district and the incidents in controversy occurred in this district.

PARTIES

4. Plaintiff, Marquet Parsons, is 56 years of age. Plaintiff resides at the above-captioned address.

5. Defendant, City of Philadelphia Sheriff's Office, maintains offices at 100 S. Broad Street, Philadelphia, PA 19110, C/O City Solicitor at the above-captioned address.

FACTS

6. Plaintiff has been employed by Defendant since 1994.

7. In or around May of 2019, Plaintiff filed a charge of discrimination alleging retaliation and hostile work environment against the City of Philadelphia Sheriff's Office, then Sheriff, Jewell Williams and Deputy Chief, Paris Washington. This action was protected activity.

8. In 2019, Rochelle Bilal was elected as Sheriff and is presently the Sheriff of Philadelphia.

9. In January of 2020, Plaintiff engaged in protected activity when he signed an affidavit that supported the claims of discrimination made by his coworkers, Richard Verrecchio and Angelina Brown.

10. In November of 2020, Plaintiff engaged in protected activity when he filed a complaint of retaliation and hostile work environment in the United States District Court For The Eastern District. This matter was resolved in or around June of 2021.

11. In 2020, Plaintiff informed Sheriff Bilal that he had pending claims of retaliation discrimination and harassment.

12. In February of 2020, Plaintiff was promoted from the position of Captain to the position of Deputy Chief.

13. In February of 2020, Plaintiff disciplined Sheriff Bilal's male Chief of Staff for sexually harassing the female Human Resources Director, Anitra Paris.

14. Following this incident, Plaintiff's relationship with Sheriff Bilal became strained and he was removed from an investigation regarding missing weapons from the Sheriff's Armory.

15. After being promoted to Deputy Chief, Sheriff Bilal notified Plaintiff that she would work to secure Plaintiff a substantial increase in pay.

16. At all times relevant, Plaintiff performed his duties at or above expectations.

17. In August of 2020, Sheriff Bilal falsely accused Plaintiff of engaging in sexual relations with Undersheriff Sommer Miller and Human Resources Manager, Anitra Paris. These actions were retaliatory.

18. Since 2020 through the present, Plaintiff has been subjected to retaliation based on prior protected activity and discrimination and harassment based upon his age. The incidents of discrimination and harassment include, but are not limited to, the following:

a. Subjecting Plaintiff to unfair scrutiny and ridiculing Plaintiff in front of his peers and subordinates on multiple occasions;

b. Excluding and alienating Plaintiff from meetings and from key decision-making matters;

c. In order to secure a raise in salary, Sheriff Bilal tried to persuade Plaintiff to give up his civil service status for the purposes of making Plaintiff an at will employee which

would have caused Plaintiff to lose any civil service and union protection;

d. After falsely accusing Plaintiff of having sexual relations with the Undersheriff, Sheriff Bilal transferred Plaintiff from his position of Deputy Chief of Internal Affairs, which he had successfully handled, and replaced Plaintiff with a younger employee;

e. After the transfer, Plaintiff was assigned to a newly created position as Deputy Chief of the Policy and Procedure Unit without any support or assistance. Subsequently, Sheriff Bilal assigned Deputy Chief Angelinel Brown and Plaintiff to share the same office while substantially younger subordinates were not required to share offices with other peers;

f. Failing to increase Plaintiff's salary after promoting him from Captain to Deputy Chief;

i. Wrongfully issuing a statement of charges against Plaintiff regarding a matter that had occurred more than a year earlier.

19. During the time that Plaintiff held the position of Deputy Chief, Sheriff Bilal denied Plaintiff the opportunity to earn overtime.

20. On August 7, 2023, for no legitimate reason and no articulated reason, Sheriff Bilal demoted Plaintiff from his appointed position as Deputy Chief to the rank of Captain.

21. During the time that Plaintiff held the position of Deputy Chief, Sheriff Bilal gave preferential treatment to Plaintiff's peers who were substantially younger than he with regard to the terms and conditions of his employment.

22. Respondent's aforesaid actions violate Title VII of the 1964 Civil Rights Act, the ADEA and PHRA.

23. Defendant's aforesaid actions constitute age discrimination and retaliation.

24. Defendant's aforesaid actions violate Title VII, the ADEA and PHRA.

25. Any reasons that Defendant alleges for the aforesaid adverse actions, which include demotion, are false and a pretext.

26. The real reasons that Plaintiff suffered adverse action with regard to the terms and conditions of his employment was because of his age and the fact that he engaged in multiple incidents of protected activity.

27. Defendant's adverse actions against Plaintiff regarding the terms and conditions of his employment constitutes retaliation in violation of Title VII and PHRA.

Count I - Title VII

28. Plaintiff incorporates by reference paragraphs 1 through 27 of this Complaint as though same were fully set forth at length herein.

29. Plaintiff has exhausted his administrative remedies and received a right to sue letter from the EEOC.

30. Defendant retaliated against Plaintiff because he engaged in protected conduct.

31. Defendant's aforesaid adverse actions against Plaintiff regarding the terms and conditions of his employment was retaliatory because Plaintiff had previously engaged in multiple incidents of protected conduct against Defendant.

32. Any non-discriminatory and/or non-retaliatory reasons offered by Defendant for their aforesaid actions are false and constitute a pretext.

33. Defendant's aforesaid retaliatory actions against Plaintiff violate Title VII of the 1964 Civil Rights Act, *et. seq.*

34. As a result of Defendant's aforesaid conduct, Plaintiff has suffered lost wages and benefits, humiliation, mental anguish, emotional distress, associated stress, pain and suffering and other injuries.

35. Plaintiff seek all damages allowable under Title VII, including back pay, front pay, compensatory damages, punitive damages, counsel fees and costs of suit.

Count II - ADEA

36. Plaintiff hereby incorporates by reference paragraphs 1 through 35 of this Complaint as though same were fully set forth at length herein.

37. At all times relevant, Plaintiff was well qualified for his position, including the positions that he applied for.

38. Plaintiff has exhausted his administrative remedies and received a right to sue letter from the EEOC.

39. Defendant has discriminated against Plaintiff because of his age (56 years old) in violation of the ADEA.

40. Defendant's aforesaid adverse actions, including the demotion of Plaintiff, violated the ADEA because it was based on Plaintiff's age.

41. Any non-discriminatory and/or nonretaliatory reasons offered by Defendant for their aforesaid actions are false and constitute a pretext.

42. Defendant's aforesaid discriminatory and retaliatory actions against Plaintiff were willful and constitute age discrimination and retaliation in violation of the ADEA.

43. As a result of Defendant's aforesaid conduct, Plaintiff has suffered lost wages and

benefits.

44. Plaintiff seeks all damages allowable under ADEA, including back pay, front pay, liquidated damages, counsel fees and costs of suit.

COUNT III - State Law Claims

45. Plaintiff incorporates by reference paragraphs 1 through 44 of this Complaint as though same were fully set forth at length herein.

46. The conduct of Defendant as alleged in the foregoing claims for relief constitutes discrimination and retaliation in violation of the Pennsylvania Human Relations Act and other State and Local laws and ordinances.

47. Defendant has at all times material to the foregoing claims acted willfully and with malice toward Plaintiff. Defendant knew, or reasonably should have known, that the aforementioned conduct was a violation of its handbook, policies and work rules and the laws of Pennsylvania and the United States. Defendant took no action to cease its wrongful conduct, and, in fact, committed further acts designed to cover the patent discrimination against Plaintiff because of his age and because he had engaged in protected activity on multiple occasions.

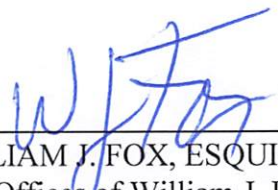
JURY DEMAND

Plaintiff demands a trial before twelve jurors.

WHEREFORE, Plaintiff, Marquet Parsons, demands judgment in his favor and against Defendant and seeks relief as follows:

- A) Awarding compensatory damages;
- B) Awarding interest calculated at the prevailing rate;

- C) Awarding equivalent pay, back pay, front pay, liquidated damages, loss of fringe benefits and all other relief allowed under the law;
- D) Awarding reasonable attorney's fees, expert witness fees and other costs of the action; and
- E) Granting such other relief as the Court deems just and appropriate.



WILLIAM J. FOX, ESQUIRE
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100 N. 20th Street, Suite 303
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(215) 546-2477
Attorney for Plaintiff

Date: June 10, 2025